UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

Reply To
Attn Of: ECL-115

June 29, 2007

James M. Anderson
DEQ Northwest Region
Portland Harbor Section
2020 SW Fourth Ave, Suite 400
Portland, OR 97201

RE: Source Control Decision
Port of Portland Terminal 5 Site
15540, 15550, & 15660 N Lombard St., Portland, OR
ECSI No. 1686

Dear Mr. Anderson:

EPA has reviewed DEQ's Source Control Decision (SCD) Memorandum for the Port of Portland Terminal 5 Site referenced above. Based on the information provided in this document, EPA cannot agree with DEQ's determination that this facility does not appear to be a current source of Willamette River water or sediment contamination. Until the following questions and comments regarding this source control decision are addressed, EPA will consider the Port of Portland Terminal 5 site as a potential source of contamination to the Portland Harbor Superfund Site. We provide the following comments for DEQ to consider in proceeding forward with its decisions regarding this site.

General Comments

1) EPA did not have copies of the referenced materials that may have offered additional information that was not provided in this document which may have answered some of the questions and/or concerns that we have with this Site (e.g., Port of Portland 2000 *Preliminary Assessment*, DEQ UST file number 26-98-0752, Port of Portland 2006 *Contaminated Area and Media Management Plan*, OSM 2006 *Source Control Evaluation Report – Metals in Groundwater*, Port of Portland 2006 *Stormwater Evaluation*, Ash Creek Associates 2006 *Groundwater Monitoring Report*). In the future, please ensure that EPA has all referenced materials for source control documents.

2) There is insufficient evidence to support the Port's conclusion that the stormwater pathway is not complete.
3) The Port's conclusion that there are no current or reasonably likely future on-site groundwater contaminants that could migrate to the Willamette River at concentrations of concern is contradictory to the evidence in this document regarding the former Blue Lagoon.
4) Even though the property is located downstream of the current study area for the Portland Harbor Superfund Site (PHSS), the boundary for the PHSS has not been established. Further, Willamette River is tidal such that any release of contaminants for the Terminal 5 Site could impact the upstream sediments within the study area. Since it is highly likely that the sediments in front of the Oregon Steel Mills, located immediately upstream of the Terminal 5 Site, will be a cleanup area for the PHSS, EPA is concerned about the potential for contaminant release from the Terminal 5 Site.

Regulatory History

1) The discussion of Notice of Non-compliance #WQ-NWR-98-052 indicates a letter from Hall-Buck Marine. This company was not discussed in the Site Description and History. Where did they operate at the Terminal 5 Site? What type of activities did they perform? What types of chemicals did they use?
2) The discussion of Notice of Non-compliance #WQ-NWR-99-008 indicates a letter from Kinder Morgan. This company was not discussed in the Site Description and History. Where did they operate at the Terminal 5 Site? What type of activities did they perform? What types of chemicals did they use?
3) How long has Alcatel been a large quantity generator? Are the waste streams reported in 2001 the same as all other years of operation? The document indicates that there was a DEQ inspection in 2007; have they been inspected by DEQ in other years? If so, when and what were the conclusions of the inspections?

Hazardous Substance Releases – Blue Lagoon

1) Was Blue Lagoon a naturally occurring water body or was it man made? What was the depth of the Lagoon? Need to provide a cross-section of Blue Lagoon with monitoring wells BL-MW-1, BL-MW-2, BL-MW-3, BL-MW-4 and MW-20; this would help EPA to determine if the well depth is adequately characterizing the groundwater plume from Blue Lagoon.
2) What was the fine, white, powder-like material in the bottom of the lagoon? Why was it a distinctive green tinge?
3) Where is the data for the subsurface soil investigations conducted by the Port in 1994 and 1995? At what depth were the samples collected? Please provide EPA a map that shows the locations of the samples.
4) Why were there PCBs (Aroclor 1248) in the Blue Lagoon?
5) It does not appear that the fill material place in the Lagoon was an appropriate cap and that the *Contaminated Area and Media Management Plan* (February 2006) is an appropriate Institutional Control. Did DEQ approve this cleanup? If so, please provide RI/FS and ROD.

6) EPA needs to be provided with groundwater contours north of Blue Lagoon to ensure that groundwater flow path is south-southeast.
7) There is no down-gradient monitoring well (MW-6 and MW-20) data for PCBs.
8) Are the data provided in Table 1 associated with the Terminal 3 monitoring wells (indicated as BL-MW-00 in Figure 3) and the data provided in Table 2 associated with the OSM monitoring wells and Retec 2005 monitoring wells?
9) Based on the groundwater contours provided in Figure 3, it appears that the Terminal 5 groundwater monitoring wells are not placed appropriately to monitor migration of contaminants from the Blue Lagoon. Need to provide Terminal 5 groundwater data for monitoring wells 1, 2, 3, and 4. If concentrations of metals in Table 1 are stable, it is likely because they are up-gradient of the Blue Lagoon flow path. Why was BL-MW-01 abandoned?
10) The only OSM monitoring wells that are within the flow path from the Lagoon to the River are MW-6 and MW-20. EPA needs more monitoring wells down-gradient of Blue Lagoon within the flow path. Additionally, EPA needs cross-sections within the flow path.
11) It seems suspect that manganese levels in MW-20 are at trace levels while all other monitoring wells, including the Terminal 5 monitoring wells up-gradient of the Blue Lagoon, have elevated levels of manganese. EPA needs more information on monitoring well 20, such as depth of well, screen placement, etc. (see comments #1 and #10)
12) EPA needs to see groundwater plume model. Do they predict that the plume will be reaching the Willamette River in concentrations that would be of concern? If model is predicting travel time from source to River to approximately 40 years and the Lagoon was active in 1975, then the plume would be reaching the River in about 7 or 8 more years.

Source Control Evaluation

1) This document indicates that sediment sampling was conducted on several occasions from 1995 to 2000. This information is not in Query Manager, thus, EPA needs to be provided with this information, including a map showing the location of the sampling, to determine if adequate sediment sampling has occurred and chemical analysis was appropriate.
2) It appears that the groundwater pathway may not be a current source, but may be a potential future source in the near future. Addition information requested above would help EPA in determining whether or not the groundwater at this site is a potential future source.
3) Since the Willamette River is tidal, there is a possibility that if there were contaminants released from the Terminal 5 property to the Willamette River that they would impact the study area for the PHSS.
4) Stormwater has not been adequately characterized to determine whether or not the stormwater pathway is problematic.

If you have any questions or would like to discuss the contents of this letter further, please feel free to contact me at (206) 553-6705.

Sincerely,

Kristine M. Koch
Remedial Project Manager

cc: Tom Gainer, DEQ-NW
Chip Humphrey, EPA-OOO
Eric Blischke, EPA-OOO
Rene Fuentes, EPA-OEA